

INTERVENOR 183016
#2-1290710am
MCNAIR LAW FIRM, P.A.

ATTORNEYS AND COUNSELORS AT LAW

COPY

Posted: D. Duke

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Dept: JA

Date: 11-30-06

Time: 9:35

November 29, 2006

11th Floor, Bank of America Tower
Post Office Box 11390
1301 Gervais Street (29201)
COLUMBIA, SOUTH CAROLINA 29211

The Honorable Charles Terreni
Chief Clerk and Administrator
South Carolina Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211

Re: Application of Neutral Tandem-South Carolina, LLC for a Certificate of Public Convenience and Necessity to Provide Resold and Facilities-based Local Exchange and Interexchange Telecommunications Services in the State of South Carolina (SCPSC Docket No. 2006-329-C)

Dear Mr. Terreni:

Please find enclosed for filing on behalf of the South Carolina Telephone Coalition an original and ten (10) copies of a Petition to Intervene in the above-referenced docket. By copy of this letter and Certificate of Service appended to the Petition, I am serving all parties of record.

Please clock in a copy of the Petition and return it by our courier.

Should you have any questions with respect to this matter, please do not hesitate to contact me.

Very truly yours,

Margaret M. Fox
Margaret M. Fox

Enclosures

cc: Bonnie D. Shealy, Esquire
Florence P. Belser, Esquire

RETURN DATE: OK D. Duke
SERVICE: OK D. Duke

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

Docket No. 2006-329-C

Re: Application of Neutral Tandem-South Carolina,)
LLC for a Certificate of Public Convenience and)
Necessity to Provide Resold and Facilities-based)
Local Exchange and Interexchange Telecommu-)
nications Services in the State of South Carolina)
_____)

**PETITION TO
INTERVENE**

In response to the Commission's Notice of the Filing of the Application of Neutral Tandem-South Carolina, LLC for a Certificate of Public Convenience and Necessity to provide local exchange telecommunications services in South Carolina, the South Carolina Telephone Coalition ("SCTC") submits the within Petition to Intervene in this proceeding. In support of its Petition, SCTC would respectfully show unto this honorable Commission that:

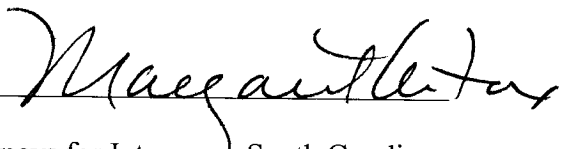
1. SCTC is a coalition of local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission.
2. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record insofar as its interests might appear.
3. SCTC's individual member companies provide local exchange telephone service within their respective geographic service areas. SCTC's position in this docket is that statewide certification of new entrant local exchange telecommunications service providers is not appropriate and is not in the public interest. The Application, as currently drafted, would potentially impact each of the SCTC member companies and, therefore, the SCTC has an interest in this proceeding.

4. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

M. John Bowen, Jr.
Margaret M. Fox
McNAIR LAW FIRM, P.A.
Post Office Box 11390
Columbia, South Carolina 29211
(803) 799-9800

By: 

Attorneys for Intervenor South Carolina
Telephone Coalition

November 29, 2006

Columbia, South Carolina

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

Docket No. 2006-329-C

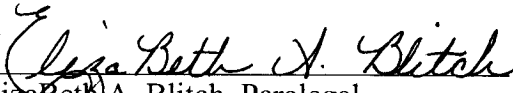
Re: Application of Neutral Tandem-South Carolina,)
LLC for a Certificate of Public Convenience and)
Necessity to Provide Resold and Facilities-based)
Local Exchange and Interexchange Telecommu-)
nications Services in the State of South Carolina)
_____)

**CERTIFICATE OF
SERVICE**

I, ElizaBeth A. Blitch, do hereby certify that I have this date served one (1) copy of the foregoing Petition to Intervene upon the following party of record by causing said copy to be deposited with the United States Mail, first class postage prepaid to:

Bonnie D. Shealy, Esquire
Robinson, McFadden & Moore, PC
Post Office Box 944
Columbia, South Carolina 29202

Florence P. Belser, Esquire
Office of Regulatory Staff
Post Office Box 11263
Columbia, South Carolina 29211.


ElizaBeth A. Blitch, Paralegal
McNAIR LAW FIRM, P.A.
Post Office Box 11390
Columbia, South Carolina 29211
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November 29, 2006

Columbia, South Carolina